

Remarks

In response to the Office Action dated January 23, 2008, Applicants respectfully request reconsideration based on the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

In the present application the specification has been amended to correct matters of form. No new matter has been added.

Claim Rejections - 35 U.S.C. §103

In the Office Action, claims 1-3, 7, 9-12, 16-18 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Pearson (US 6,023,684) in view of Giangarra (6,101,472) and further in view of Uppaluru (US 6,587,822). The rejection of the present claims is respectfully traversed.

Independent claim 1 recites, in pertinent part:

“[a] system for permitting a user to remotely access data, comprising...

a voice input device coupled to the computer for receiving spoken words as a voice input from a user...a speech recognition application executing within the computer, the speech recognition application converting the voice input into data recognized by the client application ...wherein selecting the multiple operations comprises utilizing the voice input for navigating to a search page and selecting an operation for retrieving client account information, wherein performing the multiple operations comprises inputting the client account information based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields.

The Office Action rejects independent claim 1 by asserting that Pearson describes most of the claim elements but concedes that Pearson fails to describe multiple operations and fails to describe a graphical user interface that has a page for selecting one of the multiple operations. The Office Action also concedes that Pearson fails to describe a speech recognition application with a voice module that accesses a stored separate vocabulary for each of the pages for selecting and performing the multiple operations utilized for generating the legacy transactions on the legacy system.

The Office Action proceeds by asserting that Giangarra describes a voice command interface in a data processing system and method implemented to allow a user to speak a name of a link identified by HTML to receive a desired web page from a

communication network. However, the Office Action concedes that the combination of Pearson and Giangarra fails to describe “...selecting the multiple operations comprises utilizing the voice input for navigating to a search page and selecting an operation for retrieving client account information...” and also fails to describe “...performing the multiple operations comprises inputting the client account information based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields...” The Office Action proceeds by asserting that Uppaluru cures the conceded discrepancies in the combination of Pearson and Giangarra. Applicants respectfully disagree.

As a preliminary matter, however, Applicants respectfully note that there is an additional discrepancy in the combination of Pearson and Giangarra other than those cited in the Office Action. On page 3, the Office Action asserts that the discussion of the Voice Response Units (“VRU”) discussed in Pearson lists the considerations required for voice processing in promotion of Pearson’s invention and cites Column 2, line 28 – Column 3, line 32 in support of its position. The Office Action further asserts that such a disclosure does not expressly teach away from the speech recognition feature and asserts further that Pearson teaches a voice input device coupled to the computer and cites Column 2, lines 29-33 in support of this additional contention. Applicants respectfully but completely disagree.

Applicants respectfully point out that both Pearson and the claim must each be considered as a whole, including any disclosure that teaches away for the claim elements. Column 2, line 28-Column 3, line 32 discusses the use of the internet, web browsers and a three tiered system featured in Pearson. However, nothing in the cited portion of Pearson describes the use of VRU’s or lists the considerations required for utilizing a VRU to access data over the internet.

Applicants respectfully note that Pearson describes the use of VRUs in the prior art to access a main frame database via telephone either by voice or by DTMF signals. In this description the telephone line (with VRU) is conventionally coupled to front end processors for controlling communications between the VRU’s and the mainframe. The VRU conventionally provides an audio menu to the caller and by traversing the menu

structure by pressing a key(s), a query to the mainframe may be generated. The requested information is returned and played to the caller audibly. (Col. 1, l. 11-55).

Pearson continues on to describe that in order to “overcome these and other limitations of voice response systems, systems were developed in which a user could use a personal computer and a modem to communicate with the [mainframe].” Pearson simply fails to even suggest that a VRU may be used in conjunction with a personal computer to generate a query and receive a response.

As to the Office Action’s citation of Col. 2, l. 29-33 as describing the feature of a VRU coupled to a computer, the citation as read in context (Col. 2, l. 21-33) merely describes that the installation of the computer program requires more computer knowledge than some users know and that “institutions have to contract or employ computer professionals for providing **telephone assistance** to these users” to install the software. Providing telephone tech assistance to install software has nothing at all to do with coupling a VRU to the customer’s computer. Pearson simply fails to describe a VRU coupled to a computer.

Therefore, Applicants respectfully assert that Pearson fails to support the assertions on page 3, lines 10-16 of the Office Action and fails to describe the subject matter asserted to Pearson. Because Pearson is teaching away from the use of VRU’s, there is no motivation to combine Pearson with another reference or look to Pearson at all in this regard and therefore a prima facie case of obviousness cannot be supported. As such, independent claim 1 is allowable over the combination of Pearson and any of the remaining references for at least this reason.

As discussed above, it is implied in the Office Action that the combination of Pearson and Giangarra fails to describe that “...selecting the multiple operations comprises utilizing the voice input for navigating to a search page and selecting an operation for retrieving client account information...” and also fails to describe that “...performing the multiple operations comprises inputting the client account information based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields...” The Office Action concedes that Pearson fails to describe these instant recitations and does not assert that Giangarra does describe these recitations in the current

Office Action or in any of the previous Office Actions. The Office Action goes on to assert that Uppaluru cures the discrepancies in the combination of Pearson and Giangarra.

Giangarra discusses that the vocabulary for a web page is created by parsing the mark-up document of the web page to find all of the web links and then creating the vocabulary based on those links (Col. 2, l. 18-57; Col. 6, l. 6-18). Giangarra further describes that when a user utters a word that is matched in the parsed vocabulary the word is used to **access a new web page**. (Col. 6, l. 55-61; Col. 7, l. 60-Col. L. 10). Giangarra fails to describe inputting the client account information via whole word voice input to complete at least one of the plurality of data fields. Matching an uttered word to a vocabulary in order to activate a web link is neither "...selecting the multiple operations comprises utilizing the voice input for navigating to a search page and selecting an operation for retrieving client account information..." nor "...performing the multiple operations comprises inputting the client account information based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields...". Therefore the combination of Pearson and Giangarra fails to describe the above claim recitations.

The Office Action cites Column 20, line 35 –Column, 22, line 23 of Uppaluru as curing the discrepancies of Pearson and Giangarra. However, Applicants respectfully point out that Uppaluru fails to describe the subject matter asserted to Uppaluru by the Office Action.

Uppaluru concerns itself with the provision of an audio web page at a voice web gateway 105 to a party using a telephone 111. The audio web page is retrieved from a web server on the internet and is then played to the user over the phone 111 via the telephone network 101 where each tagged element is verbalized sequentially. (Col. 5, l. 50-56). After the verbal web page is played, or during, the listener may input verbal commands or data which is transformed into HTML format and relayed to the web server. (Col. 9, l. 20-25). It is clear from Uppaluru that all of the voice recognition software is executing at the voice gateway 105 on the other side of the telephone network 101, away from the listener and is merely translating verbal-to-HTML and vice versa. (FIG. 1)

In evaluating a prima facie case of obviousness, both the claim and the reference(s) must each be considered as a whole. Considering Uppaluru as a whole, it is quite clear that because all of the translation back and forth between HTML and the listener's verbal input is done at the gateway/website 105, Uppaluru is not describing "...selecting the multiple operations comprises utilizing the voice input for navigating to a search page [on the computer] and selecting an operation for retrieving client account information [at the computer]..." nor "...performing the multiple operations comprises inputting the client account information [at the computer] based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields [on the web page on the computer]..."

As recited in independent claim 1 considered as a whole, the selecting of the multiple operations utilizing the speech input is being done at the user's computer and not at the voice gateway as described in Uppaluru. Similarly, the client information is being inputted to complete the plurality of data fields rendered on the web page displayed on computer. Therefore, because the Office Action concedes that the combination of Pearson and Giangarra fails to describe "...selecting the multiple operations comprises utilizing the voice input for navigating to a search page [on the computer] and selecting an operation for retrieving client account information [at the computer]..." and fails to describe "...performing the multiple operations comprises inputting the client account information [at the computer] based on the spoken words as the voice input to complete at least one of the plurality of data fields comprises utilizing the voice input to navigate among the plurality of data fields [on the web page on the computer]..." and Uppaluru fails to cure theses conceded deficiencies, the combination of Pearson, Giangarra and Uppaluru fails to describe each and every claim element. Therefore, a prima facie case of obviousness has not been established. As such, independent claim 1 is allowable over the combination of Pearson, Giangarra and Uppaluru for at least this additional and independent reason. Amended independent claims 7, 12, and 16 specify similar features as claim 1 and thus are also allowable for at least the same reasons. Claims 2-3, 9-11, 17-18 and 20 depend from an allowable independent claim 1, 7, 12 or 16 and are thus

allowable for at least the same reasons. Accordingly, the rejection of claims 2-3, 7, 9-13, 16-18, and 20 should also be withdrawn.

Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

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Respectfully submitted,

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